



April 13, 2023

**BY EMAIL:** [clerks@guelph.ca](mailto:clerks@guelph.ca)

City Clerk's Office  
City of Guelph  
1 Carden Street  
Guelph, ON  
N1H 3A1

Dear Mayor Guthrie and Members of Council:

**Re: City Council Meeting on April 18, 2023 – Agenda Item 3.2  
Decision Report 2023-129  
Comprehensive Zoning By-law Review and Companion Official Plan Amendment**

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Thomasfield Homes, a prominent home builder in the City of Guelph and surrounding area, is pleased to write to you to request deferral of the Comprehensive Zoning By-law (2023)-20790 dated April 18, 2023. Given the recent release of the new Provincial Planning Statement, approval of OPA 80 on April 11, 2023, and the lack of consultation with the home building industry, **there is ample reason to defer the decision**. Our previous concerns were reflected in the Joint GWDA and GDHBA letters dated March 25, 2019 and December 16, 2021.

The Province has recently released a draft Provincial Planning Statement, which proposes changes that should be considered and incorporated in the new Zoning By-law. Further, the City of Guelph has just received approval from the Province on OPA 80, which includes modifications from the Official Plan Amendment that was originally approved by Council and which directed the Comprehensive Zoning By-law. These changes should be reviewed and reflected in any new Zoning By-law to ensure that it appropriately implements the approved Official Plan. Approving a By-law that does not conform with the Official Plan or is inconsistent with the new PPS direction will only lead to further amendment and delay.

Furthermore, there are concerns regarding the proposed changes to zoning regulations, which in many cases are more restrictive than necessary. The new Zoning By-law proposes significant changes to zoning regulations in the City that could have negative implications for development and the built environment within the City. Therefore, it is crucial to ensure that all key partners are given adequate time to provide input and feedback on the proposed changes. We request that City staff consult with the building industry to gain a fuller understanding of these implications and take time to amend the Comprehensive Zoning By-law in accordance with the new PPS, OPA 80 and homebuilding industry feedback before returning to Council for a decision.

Thomasfield Homes believes there is still more work to be done to ensure the Zoning By-law is reflective of recent Provincial policy and approvals and does not have a negative impact on the City's ability to provide new residential development in line with the City and Province's goal to build 18,000 new homes by 2031.

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Apart from the evolving planning policy at the Provincial and Municipal level, Thomasfield Homes has specific concerns regarding several updated regulations within the Comprehensive Zoning By-law. We believe these regulations will have a negative impact on the homebuilding's industry's ability to provide new residential units at the density, affordability, and timelines the City desires. Some examples of these regulations are:

Table 5.2 (1) – Increased required garage area for townhouses from 18m<sup>2</sup> to 20m<sup>2</sup>

In a house product which is already constrained in livable floor area, this is a significant loss in livable space within this unit type. 18m<sup>2</sup> has proven to be sufficient garage space for residents.

Table 5.9 – Maximum garage width of 5m for single detached homes in an RL.2 zone

This eliminates the possibility of much-desired two-car garages on house products on lots less than 12m wide.

S 5.11.2 Maximum garage projection

Reducing the projection of garages to not project beyond the main front wall will impact the livable space of new residential homes. More space within the building envelope will be allocated to vehicle storage rather than livable space.

Tables 6.22, 6.26, 6.30, 6.34, 7.4, 7.8, 7.12 – Required Common Amenity Space for high-density and mixed-use development

The requirement for 20m<sup>2</sup> of Common Amenity Space (CAS) per unit is a significant land allocation for high-density development. This regulation is highly restrictive and will result in the construction of fewer residential units at a time when the City and Province have identified a need for more residential units to be constructed. In regards to Common Amenity Space, Thomasfield has had to go to the Committee of Adjustments for all of its medium density product developed in Guelph, as we were unable to provide the density while accommodating for the CAS. Modifying this requirement is a key step in supporting the development of the missing middle style of developments.

We appreciate your time and consideration of our comments. We would also appreciate being added to the notification list for any further information or City Council decision on the Comprehensive Zoning By-law.

Sincerely,



Katherine McLaughlin

**Thomasfield Homes Limited**

cc: Abby Watts, City of Guelph